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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

2:20-CR-00017-JAM

12 Plaintiff,

13 v.  
14

PRELIMINARY ORDER OF FORFEITURE

15 JEFF CARPOFF,

16 Defendant  
17

18 UNITED STATES OF AMERICA,

2:20-CR-00018-JAM

19 Plaintiff,

20 v.  
21

22 PAULETTE CARPOFF,

23 Defendant  
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25 Based upon the plea agreement and stipulation for preliminary order of forfeiture entered into  
26 between plaintiff United States of America and defendants Jeff Carpoff and Paulette Carpoff, it is  
hereby ORDERED, ADJUDGED AND DECREED as follows:

- 27 1. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), defendants Jeff Carpoff  
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1 and Paulette Carpoﬀ’s interest in the following property shall be condemned and forfeited to the United  
2 States of America, to be disposed of according to law:

- 3 a. Seagrape Villa 1722 at the Four Seasons Resort Estate Nevis, “1722 Stewart’s  
4 Estate,” Federation of St Kitts-Nevis, West Indies, Lot 12, Clarks/Jessups  
(Stewarts Estate), Parish of St. Thomas, Island of Nevis;
- 5 b. All funds maintained at Deltec Bank and Trust, account number 1001021, held in  
the name of DC Solar International, Inc.;
- 6 c. All funds maintained at JP Morgan Chase, account number 371767515, held in  
the name of Jocarbo, LLC;
- 7 d. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in  
Whetstone Winery, Inc.;
- 8 e. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in JPC  
Group Investments;
- 9 f. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Shift  
Solutions LLC;
- 10 g. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Panda  
Bear International Ltd.;
- 11 h. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in MTO  
Cafe;
- 12 i. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in JMFC,  
Inc.;
- 13 j. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in PMFC  
Enterprises LLC;
- 14 k. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in LITV  
Entertainment Group, LLC;
- 15 l. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in  
Yountville Live;
- 16 m. 1969 Plymouth Roadrunner, VIN: RM23H9E119339, California License Number  
7KWT404;
- 17 n. 2018 Bentley Bentayga, VIN: SJAAC2ZV2JC016871, California License  
Number 8ACK304;
- 18 o. 1969 Plymouth Roadrunner, VIN: RM21H9G224046, California License Number  
7KWT403;
- 19 p. 2015 Dodge Ram 5500 Chassis, VIN: 3C7WRMBL4FG594873, California  
License Number 83673W1;
- 20 q. 2018 Dodge Ram 2500 Tradesman, VIN: 3C6UR5CL1JG169183, California  
License Number 60837K2;
- 21 r. 2018 Dodge Ram 2500 Tradesman, VIN: 3C6UR5CL7JG169186, California  
License Number 99981J2;
- 22 s. 2014 Dodge Ram, VIN: 3C6UR5CL3EG291677, California License Number  
63502S1;
- 23 t. 2014 Dodge Ram, VIN: 3C6UR5CL1EG147612, California License Number  
89288N1;
- 24 u. 2018 Dodge Ram, VIN: 3C6UR5CL9JG169190, California License Number  
60844K2;
- 25 v. 2000 Porsche Boxster, VIN: WP0CA2982YU626068, Unknown License  
Number;
- 26 w. 2015 Yukon Denali, VIN: 1GKS2JKJ3FR710968;
- 27 x. 2017 Cadillac Escalade, VIN 1GYS4CKJ0HR24294;
- 28 y. 2017 Centurion Vessel, VIN: FINS1554F717, Unknown License Number;
- z. Approximately \$580,000 in U.S. Currency held by Terry L. Davis and Susan  
Rush in Las Vegas, Nevada, and described in Case No. A-19-803784-C, filed in

Clark County District Court, Jeff and Paulette Carpoﬀ v. Terry L. Davis and Susan Rush;

- aa. Approximately \$200,000 in the form of a promissory note and deed of trust, extended to Terry L. Davis and Susan Rush, residents of Las Vegas, Nevada;
- bb. Any and all sales proceeds from the vehicles listed in Exhibit A, sold in United States v. 2011 BMW 328I, VIN: WBAPH7C53BE460537, et al., 2:19-MC-00053-TLN-CKD;
- cc. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in AEC Digital Solutions, LLC;
- dd. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in American General Resources, LLC;
- ee. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in CDRL Nutritional, Inc.;
- ff. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Whetstone Wine Cellars, LLC;
- gg. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Phoenix Myrrh Ltd.;
- hh. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in NuLeaf Capital Investors Group, LLC;
- ii. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Luminary Diffusion Systems, LLC;
- jj. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in City Zenith, LLC;
- kk. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Linus Technologies Ltd.;
- ll. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in AEC Digital Solutions, LLC;
- mm. Any and all interests held by Jeffrey Carpoﬀ and/or Paulette Carpoﬀ in Hidden Oaks Investors, LLC;
- nn. Approximately \$900,000.00 associated with DC Solar and referenced as a “Standby Letter of Credit,” issued on November 23, 2012, by JP Morgan Chase, N.A.1;
- oo. Approximately \$1,350,000.00 associated with DC Solar and referenced as a “Standby Letter of Credit,” issued by JP Morgan Chase, N.A.2;
- pp. Cashier’s Check number 001433345, made payable to Champion Select Insurance, in the amount of \$1,294,645.40;
- qq. Cashier’s Check number 001433344, made payable to Bayshore Select Insurance, in the amount of \$1,282,445.00; and
- rr. Approximately \$3,729,981.00 in U.S. Currency at Deltec Bank & Trust Limited, Nassau, Bahamas, held in the name of DC Solar International, Inc.

2. The above-listed property constitutes property involved in and/or property traceable to violations of 18 U.S.C. §§ 371, 1349 and 1957(a).

3. Pursuant to Rule 32.2(b), the Attorney General (or a designee) shall be authorized to seize the above-listed property. The aforementioned property shall be seized and held by the U.S. Marshals Service, in its secure custody and control.

<sup>1</sup> The complete Standby Letter of Credit for \$900,000.00 is attached as Exhibit B.

<sup>2</sup> The complete Standby Letter of Credit for \$1,350,000.00 is attached as Exhibit C.

1           4.       a.       Pursuant to 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(n)  
2 and Local Rule 171, the United States shall publish notice of the order of forfeiture. Notice of this  
3 Order and notice of the Attorney General's (or a designee's) intent to dispose of the property in such  
4 manner as the Attorney General may direct shall be posted for at least 30 consecutive days on the  
5 official internet government forfeiture site [www.forfeiture.gov](http://www.forfeiture.gov). The United States may also, to the  
6 extent practicable, provide direct written notice to any person known to have alleged an interest in the  
7 property that is the subject of the order of forfeiture as a substitute for published notice as to those  
8 persons so notified.

9                   b.       This notice shall state that any person, other than the defendant, asserting a legal  
10 interest in the above-listed property, must file a petition with the Court within sixty (60) days from the  
11 first day of publication of the Notice of Forfeiture posted on the official government forfeiture site, or  
12 within thirty (30) days from the receipt of direct written notice, whichever is earlier.

13           5.       If a petition is timely filed, upon adjudication of all third-party interests, if any, this Court  
14 will enter a Final Order of Forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), in  
15 which all interests will be addressed.

16           SO ORDERED this 13<sup>th</sup> day of March, 2020

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18                               /s/ John A. Mendez  
19                               JOHN A. MENDEZ  
20                               United States District Court Judge  
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